



U.S. Department of Justice

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April 19, 2021

BY ECF

The Hon John Michael Vazquez
District Court Judge
United States Courthouse and Post Office
Newark, New Jersey 07102

Re: U.S. v. Michael Healy et al., Crim. No. 18-703

Dear Judge Vazquez:

The Government is respectfully requesting additional time to respond to defendant Michael Healy's motion filed in this matter (Dkt. No. 113). The Court granted the Government's prior request for an extension of time to respond until April 30, 2021. Due to a personal scheduling matter, I reached out to counsel for Mr. Healy to seek additional time to respond. Mr. Healy's counsel has consented to an additional extension until May 19, 2021. The Government now respectfully requests the Court grant an extension to answer the motion until May 19, 2021. Since the filing of the defendant's motion on February 24, 2021, the Government has granted, at counsels' request, an additional extension for Mr. Healy to submit his mitigation information to the Acting United States Attorney for the District of New Jersey. That deadline is now June 30, 2021. In light of that, no prejudice to the defendant will result from a further extension of time. Thank you for your consideration in this matter

Very truly yours,

RACHAEL A. HONIG
Acting United States Attorney

S//Robert Frazer
By: Robert Frazer
Assistant United States Attorney

cc. Stephen Turano, Esq.
Thomas Ambrosio, Esq.